

# EXHIBIT 1

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA

v.

TIMOTHY R. FLAHERTY,

Defendant.

CRIM. NO. 15-10127-MLW

Declaration of Assistant U.S. Attorney Fred M. Wyshak, Jr.

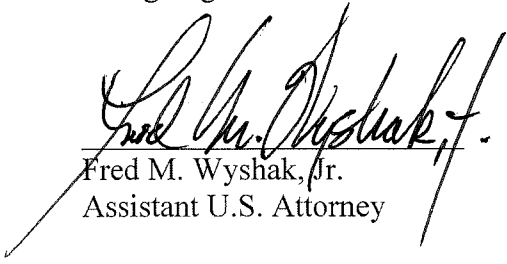
I, Fred M. Wyshak, Jr., pursuant to 28 USC §1746, declare and say,

1. I am an Assistant United States Attorney in the District of Massachusetts. I have been so employed since 1989. I am currently the Chief of the Public Corruption and Special Prosecutions Unit (“PCU”) in the U.S. Attorney’s Office, and have acted in that capacity since approximately January 2014. Included among the crimes that this unit investigates and prosecutes are those related to violations of a private citizen’s civil rights.
2. On December 23, 2014, PCU received information regarding a civil rights and witness tampering case involving an individual named Ralph Feinberg, who apparently had a lengthy criminal record and had just finished a term of federal probation, and attorney Tim Flaherty, who was attempting to pay off the victim to drop the state case against Feinberg. This matter was accepted for investigation at that time for potential violations of any federal civil rights or witness tampering laws.
3. A check of the Department of Justice’s case management system indicates that the

investigation of Feinberg and Flaherty was officially opened on December 24, 2014.

I declare under the penalty of perjury that the foregoing statements are true and correct.

Dated: August 11, 2015



Fred M. Wyshak, Jr.  
Assistant U.S. Attorney